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JUL 18 2006

PATENT

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In the Application of)
Applicants: James Benjamin Williams et al.)
Serial No. 10/797,889) Examiner
Filed: March 10, 2004) Thu Thao Havan
Title: Methods for issuing, distributing, managing) Art Unit 3624
and redeeming investment instruments)
providing securitized annuity options)

Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

Dear Sir:

AMENDMENT

In response to the outstanding Office Action on June 15, 2006, please amend the above-identified application by making the changes described in the following sections, each of which begins on a separate page:

Amendments to the claims

Remarks

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Dear Sir:

FAX TRANSMISSION COVER LETTER

- 20 SHEETS TOTAL -

The attached AMENDMENT (19 pages) is being transmitted via facsimile to the central facsimile number of United States Patent and Trademark Office, (571) 273-8300, on July 18, 2006.

Respectfully submitted,



Dated: July 18, 2006

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I hereby certify that this *Amendment* is being transmitted by facsimile to the central facsimile number of the U.S. Patent and Trademark Office, 571-273-8300, on July 18, 2006.



Dated: July 18, 2006

Signature

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